

I would like to comment on the proposed LPAM service.

I support the proposal for a licensed LPAM service. However, I have some changes to propose:

The maximum transmitted power permitted (into a $\frac{1}{4}$ -wavelength antenna over a ground plane consisting of 120 90-degree-length radials) should be 100 watts in rural areas (near towns of < 10,000 persons), 50 watts in suburban areas (near towns of 10,000 – 50,000 persons), or 25 watts in urban areas (near towns of > 50,000 persons).

The co-channel and adjacent-channel spacing requirements should be the same as for full power licensed AM stations, with LPAM stations being treated as class C stations for spacing considerations. Spacing considerations should be based on established field strengths for existing stations and calculated field strengths for proposed LPAM stations. Example: the 0.1mv/m contour of an LPAM station should not overlap the 0.1mV/m co-channel contour of a class C station.

If an LPAM applicant is unable to find a usable frequency at the maximum power permitted, he/she should be permitted to seek a lower power output, not to be less than 5 watts.

Third-adjacent spacing should be permissible for LPAM stations, and when it's an LPAM versus another LPAM or a full power station transmitting with 1,000 watts or less, second-adjacent spacing should be permitted.

If IBOC operation of LPAM stations is permitted, however, the IBOC carrier's and sidebands' 0.001uV/m contours should not overlap the 0.001uV/m contour of any station within 50kHz of the IBOC LPAM station's carrier frequency.

I also propose a couple changes to the part 15 rules for the AM band.

I propose that the power output limit be increased to 1 watt, and the antenna length limit be increased to 25 meters. Also, I propose that the permissible band be extended up to 1725 kHz.